## Case 1:20-cv-00695-AJN Document 20 Filed 11/09/20 Page 1 of 1 LEE LITIGATION GROUP, PLLC

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November 9, 2020

## Via ECF

The Honorable Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re:

Oquil v. National Labor Strategies, L.L.C., et al.

Case No. 20-cv-00695

Dear Judge Nathan:

SO ORDERED.

SO ORDERED. 11/ ALISON I. NATHAN, U.S.D.

This firm represents Plaintiff in the above-referenced matter. We write jointly with counsel for Defendants to respectfully request 1 an adjournment of twenty-one (21) days for the initial pretrial conference, currently scheduled for November 13, 2020 at 3:15 p.m., rescheduling it to December 4 and 2 a fourteen (14) day extension of time, from today until November 23, for Plaintiff to submit his notice of intent to the Court to amend the pleadings or otherwise respond to Defendants' pending motion to dismiss, Dkt. 22. The parties are also amenable to the Court's resetting the above deadlines to dates and times that are convenient for the Court.

On November 5, 2020, counsel for the parties telephonically met-and-conferred to discuss the status of this case, and have expressed a joint interest in privately resolving it through settlement. Accordingly, the parties presently wish to (1) adjourn the initial pretrial conference scheduled for November 13, 2020 to December 4; and (2) allow Plaintiff until November 23 to inform the Court as to how he intends to respond to Defendants' pending motion to dismiss.

This is the parties' first request to adjourn the initial pretrial conference in this matter. Furthermore, this is Plaintiff's first request to extend his time to provide his notice of intent to respond to Defendants' motion to dismiss.

We thank the Court for considering this matter.

Respectfully submitted,

/s/ C.K. Lee C.K. Lee, Esq.

cc: all parties via ECF